

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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HILARION JUAREZ-RAMOS,

Plaintiff,

-against-

“JOHN DOE” and J.B. HUNT TRANSPORT, INC.,

Defendants.  
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Docket No.: 1:22-cv-03647

**NOTICE OF REMOVAL**

Removed from the  
Supreme Court, Queens  
County Index No.: 710293/2022

The defendants, **J.B. HUNT TRANSPORT, INC.**, remove this action from the Supreme Court, Queens County to the United States District Court for the Eastern District of New York.

1. The plaintiff commenced this action against **J.B. HUNT TRANSPORT, INC.** in the Supreme Court of the State of New York, Queens County. A copy of the complaint is attached as **Exhibit “A”**.

2. The plaintiff, Hilarion Juarez-Ramos, is a citizen of the State of New York and was a citizen of the State of New York when this action was started in state court. Hilarion Juarez-Ramos resides at 48-15 48<sup>th</sup> Street, 1<sup>st</sup> Floor, Sunnyside, New York 11104. Hilarion Juarez-Ramos is a resident of the County of Queens, New York.

3. J.B. Hunt Transport, Inc. is (and was) a corporation incorporated in the State of Georgia with its principal place in business in Lowell, Arkansas.

4. Defendant J.B. Hunt Transport, Inc. was served on or about May 31, 2022.

5. This court has subject-matter jurisdiction over this action under section 1332(a)(1) of the Judicial Code, 28 U.S.C. § 1332(a)(1), because this action—both now and when it was started—is between citizens of different states and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs. Plaintiff is claiming injuries of bulging discs at L4-L5 and

Lumbar radiculopathy. Based on an Operative Report dated of Dr. Arden M. Kaisman, plaintiff underwent a lumbar discectomy and annuloplasty at the L4-L5 level.

6. The defendants may, under section 1441(a) of the Judicial Code, 28 U.S.C. § 1441(a), remove this action to this court because this is a civil action of which the District Courts of the United States have original jurisdiction that is brought in a state court.

7. All defendants join in the removal of this action to this Court.

Dated: New York, New York  
June 21, 2022

**RAWLE & HENDERSON LLP**  
Attorneys for Defendants  
**J.B. HUNT TRANSPORT, INC.**



By: \_\_\_\_\_

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